

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Amendment of Part 97 of the Commission's</b>	)	<b>RM-10811</b>
<b>Amateur Service Rules to Eliminate</b>	)	
<b>Morse Code Testing</b>	)	
	)	
<b>To: The Commission</b>	)	

**COMMENTS TO THE PETITION**

**Concerning the Morse Code**

I disagree with the petition inasmuch as the petitioners seem not to understand the reason for Morse testing and why it is or is not of relevance to the Amateur Service. The retention of Morse Code testing for any class of Amateur Radio license serves no apparent purpose, and all such testing should be eliminated at the earliest opportunity. As has been pointed out by others, the only reason a Morse exam was required at all was so that amateur radio operators could understand instructions from government stations to cease operating if they were interfering with traffic involving safety or other critical communications, and only then because everyone, amateur and commercial, was using spark transmitters. Spark is gone, thousands of stations can operate at the same time without interference, and the military no longer needs the services of thousands of trained Morse code operators.

The fact that the petitioners enjoy the use of Morse Code is not relevant to the issue at all. They are entitled to be proud of their accomplishments as Morse operators, just as a person interested in some other phase of Amateur Radio is entitled to be proud of their accomplishment. By way of example, I personally know several Amateur Radio operators that are very enthusiastic users of “moonbounce” (Earth Moon Earth) stations. This is a difficult task to accomplish successfully, and they are justifiably proud of their work. Does the FISTS group therefore believe that a “true” Radio Amateur must also have constructed and operated their own moonbounce communications system? They claim to be interested in attracting “hard working, well disciplined, technically minded amateurs.” Where in any of that does it say or imply that only persons possessing Morse Code skills can meet those requirements? Those fellows using moonbounce equipment have pretty clearly worked hard, are technically accomplished, and well disciplined – and yes, most of them use Morse Code for their work. Not because the law said they had to, but because it works better in this application than most other modes.

So, is there a place for Morse Code? Of course there is. Those who need to use the code will learn how it works and gain skill as needed. That still is no reason to require it as part of the exam. Nobody uses spark on moonbounce either.

They also state that Morse Code offers a significant advantage to stations in signal to noise ratio over voice modes. This is for the most part true, but why stop there? It is a proven fact that modes such as spread-spectrum, PSK31, and others can deliver reliable communications under even worse conditions, in some cases literally operating below the noise floor of conventional receivers. And, those modes offer substantially faster data throughput than Morse Code.

Petitioners also state that the Morse Code is not a detriment to young people desiring to become licensed Amateur Radio operators, and in fact they “are attracted to it as much as they are to other secret languages and puzzles.” This may be true, for some children, but this “attraction” soon wears thin when contemplated by an adult or even a high-school age person faced with demands of getting an education, managing a career, caring for a family, and other challenges. The largest number of comments I hear concerning Amateur Radio, once some learns that I have a license, consist of “do you guys still make everyone learn that old fashioned code?” (or some version of the same). It is true that a few young people win awards for Morse Code accomplishments, but most don’t. Is Amateur Radio to remain an elitist club, closed to all but a few, or is it time to let some new ideas and thinking in?

### **Concerning Consolidation of License Classes and other exam issues**

I am in partial agreement with the petitioners comments concerning adjustments to the various license classes, but disagree with their comments about the relative degree of difficulty for various exam elements and the number of questions that should be on each exam. They also do not address the issue of a better way to get newcomers into the ranks of licensed amateur radio operators. I believe a totally new approach to the entry level license is warranted, instead of a rehash of 50 year old ideas. Such a proposal is being developed, and will be submitted when ready.

The purpose of an examination should be to ascertain that the applicant has a sufficient understanding of the legal and technical issues that are needed to insure he or she is able to operate his or her equipment efficiently and without causing interference to other services. The purpose of an examination is decidedly not to create an engineer or expert in radio law.

Petitioner also suggests that immediate retesting be prohibited. As long as the requirement that the applicant not be given the same exam more than once during a session, where is the problem? If the VE team has the time, and both the examiners and the applicant are otherwise willing to continue, why not allow it? Many applicants have traveled long distances to attend an exam session, and refusing immediate retesting is unnecessarily restrictive and perhaps counterproductive. Telling someone to “go home and study some more” could be perceived as insulting or derogatory, and may serve to enhance impressions that Amateur Radio enthusiasts are guilty of elitism, or worse. The original reason for requiring a long (30 day) wait between attempts by an applicant derived in part from the relative paucity of unique exams available to the FCC. With current technology, hundreds or thousands of unique exams can be created on demand by any number of available software packages. The

likelihood of an applicant receiving identical exams is miniscule, and not worth consideration. Even among those VEC's that use previously prepared paper exams, every one of which I am aware has a stock of at least 20 different exams per element, and in those cases, the questions are carefully chosen so as to reduce "repeats" as much as is possible.

### **Personal information**

I joined the ranks of Amateur Radio licensees with a Novice license in 1959, and have been licensed continuously since that time. I have held an Amateur Extra Class operator license since August of 1976. I have also held a FCC Commercial radio operator license since 1963, originally a First Class Radiotelephone, with Ship Radar and Aircraft endorsements, it was modified to a General Radiotelephone Operators License when all such licenses were converted several years back. I am a life member of the American Radio Relay League (ARRL) and the Vice Chairman of the National Conference of Volunteer Examiner Coordinators (NCVEC). Oddly enough, when I can find time to operate, which is regrettably rare, my favorite operating mode is CW (Morse Code).

Respectfully submitted,

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